

FILED
02-12-2019
CIRCUIT COURT
DANE COUNTY, WI
2019CV000084

EXHIBIT C

STATE OF WISCONSIN CIRCUIT COURT DANE COUNTY
BRANCH 15

THE LEAGUE OF WOMEN VOTERS OF WISCONSIN,
DISABILITY RIGHTS WISCONSIN, INC.,
BLACK LEADERS ORGANIZING FOR COMMUNITIES,
GUILLERMO ACEVES, MICHAEL J. CAIN, and
JOHN S. GREENE,

Case No. 19-CV-84

Plaintiffs,

Case Code 30701 & 30704

v.

DEAN KNUDSON, JODI JENSEN, JULIE M. GLANCEY,
BEVERLY GILL, ANN S. JACOBS, MARK L. THOMSEN,
MEAGAN WOLFE, and TONY EVERS,

Defendants.

AFFIDAVIT OF ERIN GRUNZE

STATE OF WISCONSIN

COUNTY OF DANE

Erin Grunze, first being duly sworn on oath, depose and state as follows:

1. I am the Executive Director of the League of Women Voters of Wisconsin ("LWVWI"). I make this affidavit in support of plaintiffs' motion for temporary injunction.

2. I have personal knowledge of the matters set forth herein, and, if called as a witness, I could and would testify competently as to the truth of such matters.

3. LWVWI is a nonpartisan, nonprofit, non-stock corporation organized under the laws of the State of Wisconsin with its principal office located at 612 West Main St., Suite 200, Madison, Dane County, Wisconsin.

4. LWVWI works with and through 20 local Leagues in the following cities, counties, and areas throughout Wisconsin: Appleton, Ashland/Bayfield Counties, Beloit, Dane County, Door County, the Greater Chippewa Valley, Greater Green Bay, Janesville, the La Crosse area, Manitowoc County, Milwaukee County, the Northwoods, Ozaukee County, the Ripon area, Sheboygan County, the Stevens Point area, the Upper St. Croix Valley, the Whitewater area, Winnebago County, and the Wisconsin Rapids area.

5. LWVWI is part of The League of Women Voters of the United States, which has 700 state and local Leagues in all 50 states, the District of Columbia, Puerto Rico, the Virgin Islands, and Hong Kong. Formed from the movement that secured the right to vote for women, the centerpiece of The League of Women Voters' efforts remains to expand participation and give a voice to all Americans at every level of government. These efforts are grounded in our respected history of making democracy work for all Americans. The League of Women Voters is a nonpartisan organization, neither supporting nor opposing candidates for office at any level of government.

6. LWVWI works to expand participation in government and give a voice to all Wisconsinites. LWVWI encourages the informed and active participation in government and influences public policy through education and advocacy.

7. One of LWVWI's primary goals is to promote and expand effective voter participation in government. To accomplish this goal, LWVWI advocates for policies and

processes that facilitate voter registration and access to the polls, and engages in initiatives that encourage every eligible Wisconsin voter's participation in our democracy.

8. LWVWI's key initiatives include conducting voter registration drives throughout the state and educating eligible voters on requirements for voting, particularly in-person absentee voting, or "early voting," and identification requirements.

9. LWVWI is harmed by Section 1K of 2017 Wisconsin Act 369, which changes the time during which in-person absentee voting is permitted. Under Section 1K, in-person absentee voting may occur from 14 days preceding the election to the Sunday preceding the election, except it cannot occur on a legal holiday. Prior to Act 369, some counties and municipalities offered early voting more extensively than Act 369 allows. For example, in the November 6, 2018 general election, the City of Milwaukee allowed early voting to take place starting on September 24, 2018, nearly 44 days prior to the election, allowing a total of approximately thirty-four days of early voting. The City of Madison provided thirty-three days of early voting, beginning on September 20 and ending on November 3, 2018. On its website, the Elections Commission published daily reports tallying the number of absentee ballots cast in each county leading up to the November 6, 2018 general election. *See* <https://elections.wi.gov/publications/statistics/absentee>. According to the Absentee Ballot Report from November 6, 2018, a total of 565,591 Wisconsinites voted early in the 2018 general election. At least 141,257 of those voters, or 25 percent, voted prior to Act 369's

restricted time frame, according to the Elections Commission's Absentee Ballot Report from October 22, 2018.

10. LWVWI serves tens of thousands of voters, through in-person voter registration assistance to complete online and paper registrations. LWVWI distributes voter information in the form of thousands of pamphlets, guides, and stickers. LWVWI engaged hundreds of thousands of individuals through our website and social media platforms in the months prior to the November election. League members canvass in multiple counties that we serve and assisted with transportation to and from the polls and the Wisconsin Division of Motor Vehicles ("DMV") to assist voters in obtaining identification cards, both permanent and temporary. LWVWI believes that these efforts contributed to the high early voter turnout in the November 2018 election.

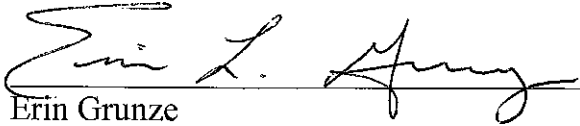
11. As LWVWI's experience and the Elections Commission's absentee ballot reports demonstrate, Act 369's restrictions on early voting harm Wisconsin voters by limiting the opportunities for voter participation in Wisconsin elections and making voting more difficult for voters who would otherwise have broader opportunities to participate in elections. The early voting restrictions thus impair LWVWI in fulfilling its mission of expanding voter participation.

12. LWVWI is further harmed by 2017 Wisconsin Act 369's codification of the Department of Transportation (DOT) petition process contained in DOT administrative rules permitting an individual who does not possess otherwise required documentation to obtain a state identification card for voting by providing secondary documentation or through other verification. This codification perpetuates a system well known to be

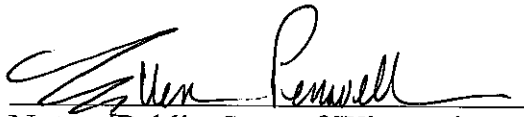
defective and prevents eligible voters from participating in Wisconsin elections, thereby impairing LWVWI in fulfilling its mission of expanding voter participation. For example, the codification of the DOT petition process included a 60-day period for temporary identification cards, which is in direct contravention of a September 30, 2016 federal district court order directing that temporary identification cards be valid for 180 days. I have personal knowledge that, prior to the November 2018 election, LWVWI transported eligible voters to the DMV to advocate for and assist voters in securing a temporary identification card and assist with the petition process with the understanding that the temporary identification cards would be valid for 180 days. As a direct result of the changes to election laws passed in the December 2018 Extraordinary Session, LWVWI must divert scarce resources to educate eligible voters as to those changes, particularly restrictions on early voting, and to participate in this lawsuit and other advocacy to prevent the implementation of those changes. LWVWI's resources will be diverted away from efforts to register voters and other efforts to enhance participation in the February primary for the 2019 Spring Election.

13. LWVWI is further harmed by all three laws adopted through the December 2018 Extraordinary Session—and indeed by the December 2018 Extraordinary Session itself—in that the legislature convened to conduct business unconstitutionally, which undermines public confidence in the Wisconsin government and thereby impairs LWVWI's mission to inspire Wisconsinites to become involved in state government.

14. The adoption of the above-stated provisions of the acts passed in the December 2018 Extraordinary Session have caused, and will continue to cause, LWVWI and its members irreparable harm.


Erin Grunze

Subscribed and sworn to before me
this 10 day of January, 2019.


Notary Public, State of Wisconsin
My commission expires: 12-8-2019